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11 Attorneys for Defendants  
12 OLD REPUBLIC NATIONAL TITLE INSURANCE  
13 COMPANY and OLD REPUBLIC TITLE INSURANCE  
14 GROUP, INC.

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

DLJ MORTGAGE CAPITAL, INC.,

Plaintiff,

vs.

OLD REPUBLIC TITLE INSURANCE  
GROUP, INC.; OLD REPUBLIC  
NATIONAL TITLE INSURANCE  
COMPANY; TITLEONE OF LAS VEGAS,  
INC.; DOE INDIVIDUALS I through X;  
and ROE CORPORATIONS XI through  
XX, inclusive,

Defendants.

Case No.: 2:20-cv-01662-KJD-VCF

**STIPULATION AND ORDER  
EXTENDING DEFENDANTS' TIME  
TO RESPOND TO COMPLAINT**

**(First Request)**

Defendants Old Republic National Title Insurance Company ("ORNTIC") and Old Republic Title Insurance Group, Inc. (collectively, "Defendants") and plaintiff DLJ Mortgage Capital, Inc. ("DLJ") (collectively, the "Parties"), by and through their counsel of record, hereby stipulate as follows:



1           **WHEREAS**, DLJ commenced the action by filing a Complaint on September 8, 2020, in  
2 the Eighth Judicial District Court for the State of Nevada, Clark County (Case No. A-20-820843-  
3 C);

4           **WHEREAS**, on September 10, 2020, ORNTIC filed a Petition of Removal with this  
5 Court, based upon diversity jurisdiction (ECF No. 1);

6           **WHEREAS**, on September 15, 2020, DLJ served Defendants with the complaint pursuant  
7 to the executed summons filed on September 30, 2020 (ECF Nos. 7-8);

8           **WHEREAS**, Defendants' responses to the complaint are due on October 6, 2020;

9           **WHEREAS**, Defendants are requesting an extension of time to respond to the complaint  
10 to afford Defendants' counsel additional time to review, analyze and respond to DLJ's complaint;

11           **WHEREAS**, DLJ has agreed to extend Defendants' time to respond to the complaint to  
12 November 6, 2020; and

13           **WHEREAS**, this is the first stipulation for an extension of Defendants' time to respond to  
14 the complaint.

15           Now, therefore, the parties hereto, by and through their counsel of record, hereby stipulate  
16 and agree as follows:

- 17           1.       Defendants shall respond to the complaint on or before November 6, 2020.
- 18           2.       Defendants intend to preserve their rights and do not expressly waive any and all  
19 defenses listed in Fed. R. Civ. P. 12(b).

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1 DATED this 6th day of October, 2020

DATED this 6th day of October, 2020

2 WRIGHT FINLAY & ZAK, LLP

EARLY SULLIVAN WRIGHT  
GIZER & McRAE LLP

3  
4 /s/-Darren T. Brenner

/s/-Sophia S. Lau

5 By: \_\_\_\_\_

By: \_\_\_\_\_

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12 Attorneys for Plaintiff  
13 DLJ MORTGAGE CAPITAL, INC.

Attorneys for Defendants  
OLD REPUBLIC NATIONAL TITLE  
INSURANCE COMPANY and OLD  
REPUBLIC TITLE INSURANCE GROUP,  
INC.

14 **ORDER**

15 **IT IS SO ORDERED:**

16 10-6-2020

17 Dated: \_\_\_\_\_

18 By:   
19 UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on October 6, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Electronic Service List for this Case.

I declare under penalty of perjury under the laws of the United State of America that the foregoing is true and correct.

/s/ D'Metria Bolden

D'METRIA BOLDEN  
An Employee of EARLY SULLIVAN  
WRIGHT GIZER & McRAE LLP

